

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

Within the scope of and has direct relationship with the proposed action, and includes support reason for the responsible official to consider		
Source	Comment	Response
American Forest Resource Council 6	We would like the Plumas NF to consider a recently published study conducted by NCASI when assessing treatment areas and their potential affects to owls (Irwin, L.L., D.F. Rock, S.C. Rock, C. Loehle, and P.V. Deusen. 2015). Among other findings, this study (Irwin et al. 2015) concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls.	<p>Irwin et al. (2015), (page 240, section 5.2., management implications – mixed conifer forests, paragraph 1) suggest harvests might be conducted under a silvicultural prescription that calls for thinning from below or individual tree selection that involves small openings and retains trees in an irregular distribution that includes some occluding patches of smaller-diameter trees and retaining early-seral dominants such as Douglas-fir and sugar pine, including scattered old remnants.</p> <p>The proposed action and action alternative were designed using management strategies such as variable density thinning (EA, page 7, paragraphs 3 and 4), thinning from below (EA, page 7, paragraph 5), and individual tree selection (EA, page 7, paragraphs 6 and 7). The decision rationale (DN, page 4, paragraph 1) includes judicious applications of partial-harvest forestry, primarily commercial thinning, is intended to maintain or improve existing suitable habitat for California spotted owl in the short-term.</p>
American Forest Resource Council 8	Alternative C (the IR alternative) is less effective than alternative B and it may need to be subsidized with other funding sources. Choose alternative B.	It is our intention to draft a decision that would meet the project purpose and need (EA, pages 1—5), for which cost and revenue estimates provide confidence that the project can be implemented in full with little or no supplemental funding (EA, page 17, table 2), and that judicious applications of partial-harvest forestry, primarily commercial thinning, is intended to maintain or improve existing suitable habitat for California spotted owl in the

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		<p>short-term (DN, page 4, paragraph 1).</p> <p>In the proposed action (Alternative B) we propose some mechanical treatments within suitable CSO habitat based on <i>“judicious applications of partial-harvest forestry, primarily commercial thinning, [that] have the potential to improve foraging habitats for spotted owls</i> (Irwin et al. 2015).” These consist of 59.8 acres of thinning from below, an additional 93.4 acres of mastication or biomass, and reducing more cost intensive hand cutting, piling, and pile burning by 180.9 acres (EA, pages 9-11, page 14, table 1).</p>
Sierra Forest Legacy 1	Until the development of a peer reviewed and scientifically-supported final conservation strategy the IR should be considered the best available science. As such, IR alternative should be selected.	<p>Our IDT reviewed the literature cited as well as the IR and incorporated this into the planning of action alternatives (Seamans and Gutierrez 2007, Stephens et al. 2014, Tempel et al. 2014, Irwin et al. 2015, USDA Forest Service 2015, Tempel et al. 2016, North et al. 2017).</p> <p>The decision rationale (DN, page 4, paragraph 1) includes judicious applications of partial-harvest forestry, primarily commercial thinning, intended to maintain or improve existing suitable habitat for California spotted owl.</p> <p>Due to early and specific comments, some prescriptions were developed in direct collaboration with SFL (emails located at: <a href="https://usfs.app.box.com/folder/42847819474">https://usfs.app.box.com/folder/42847819474</a>).</p>
Sierra Forest Legacy 2	Effective fuel treatments do not need to degrade spotted owl habitat.	<p>Although this is not primarily a fuels reduction project so much as it is a forest health and habitat improvement project (EA pages 1-5), fire resistant stand structure is still a project goal. The intent is silvicultural prescriptions aimed at reducing stand density and increasing resiliency to disturbance events such as insect outbreaks, drought, and fire (Cluck 2014).</p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		<p>Thinning suppressed, intermediate, and codominant tree classes would reduce stand densities and promote the growth and vigor of codominant and dominant conifers-that is, the older, mature, larger trees would be retained longer in the overstory. Stand health would be improved, and individual tree mortality would be reduced (EA, page 22, paragraph 9).</p> <p>Management strategies designed to preserve and facilitate the growth of tall trees while reducing the cover and density of understory trees may improve forest resilience to drought and wildfire while also maintaining or promoting the characteristics of owl habitat (North et al. 2017).</p>
Sierra Forest Legacy 3	Ask you remove references to economic feasibility from the analysis and simply refer to the economic cost and benefit of the different alternatives.	<p>After seeking clarification, the commenter is concerned about the prejudicial inference of using terms such as feasible and that “feasibility” can be arbitrarily met, or failed to be met, by manipulating the amount, type, and mix of treatments without a deeper cost, revenue, and benefits discussion. We have revised the Economics (EA, pages 15-17) and provide a revenue cost analysis that presents the timber value versus project costs of the two action alternatives.</p>
Center for Biological Diversity 1	Choose the IR alternative although we would prefer you withdraw all mechanical thinning in owl habitat.	<p>The IR alternative (Alternative C) has no mechanical thinning in CSO designated habitat. Our IDT reviewed the literature cited as well as the IR and incorporated this into the planning of a proposed action (Alternative B).</p> <p>The IR do not preclude mechanical treatments within suitable CSO habitat. Rather, they recommend that no mechanical treatment occur within the designated habitat acres unless it is intended to maintain or improve habitat</p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		conditions for the spotted owl in the short-term (1-5 years). Refer to responses in AFRC6, AFRC 8, SFL 1, and SFL 2 above for further discussion of this issue.
Center for Biological Diversity 2	Recent literature reiterates that loss of canopy cover and forest complexity from logging is detrimental to owls.	We are proposing treatments that will address the high numbers of trees per acre while working to maintain canopy cover and forest complexity within designated habitat. We are proposing a combination of treatments specific to stand characteristics including prescribed fire only, HCPB, thinning from below and biomassing, and follow-up and maintenance burning. Please refer to the 6 responses above.
Center for Biological Diversity; John Muir Project Objection Issue 1, April 17, 2017	Issue 1: Canopy cover and overall forest complexity (vertical and horizontal structure) should be maintained in areas where owls can live, such as the Gibsonville Project area, as the reduction of canopy cover due to mechanical thinning can significantly reduce habitat value for owls (see, e.g. Tempel et al. 2014) (Objection, p. 1).	Refer to the Issue Exhaustion, Record Citation and Analysis Worksheet, Objection #17-05-11-0002-O218-HFRA, Gibsonville Healthy Forest Restoration Project (PALS #47960) located at: <a href="https://usfs.app.box.com/file/253480381077">https://usfs.app.box.com/file/253480381077</a>
Center for Biological Diversity; John Muir Project Objection Issue 2, April 17, 2017	Issue 2: We were under the impression that there would be no reduction in canopy cover in owl habitat within an owl territory (as defined by the Interim Recommendations), but this prescription is not clear enough to ensure that outcome and could instead result in canopy cover loss (Objection, pp. 1-2).	Refer to the Issue Exhaustion, Record Citation and Analysis Worksheet, Objection #17-05-11-0002-O218-HFRA, Gibsonville Healthy Forest Restoration Project (PALS #47960) located at: <a href="https://usfs.app.box.com/file/253480381077">https://usfs.app.box.com/file/253480381077</a>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

Comments that are not within the scope of or do not have a direct relationship with proposed action; or meet nonsignificance		
Source	Comment	Response
Dick Artley Objection Issues, March 30, 2017	Issues 1-11 are addressed. We did not continue through the 20 submitted objection issues.	Refer to the Issue Exhaustion, Record Citation and Analysis Worksheet, Objection #17-05-11-0001-O218-HFRA, Gibsonville Healthy Forest Restoration Project (PALS #47960) located at: <a href="https://usfs.app.box.com/file/253478913801">https://usfs.app.box.com/file/253478913801</a>
Dick Artley – A (issue 1)	Please respond to each opposing view and post the responses online for the public to see. Reference to 40 CFR 1502.9.	The comment email contains attachments with numerous excerpts from a variety of different authors in different locations and with different objectives. While we do not necessarily dispute disclosures in the cited documents, neither do we categorically agree with the findings or recommendations in the literature referenced. More importantly, the attachments are not within the scope of the proposed action, do not have a direct relationship to the proposed action, or do not include supporting reasons for the responsible official to consider. 40 CFR 1502.9 is specific to Environmental Impact Statements (EIS), not to Environmental Assessments (EA).
Dick Artley 1 (comment 1)	Logging and roading damage amenity resources. The NEPA document (EA) effects should address the science presented.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley 2	National Forests are not private industrial tree farms, nor should they be treated that way to achieve tree farm goals.	The commenter doesn't differentiate between industrial tree farming and vegetation management of public lands. The project does not include any proposal to implement private industrial tree farming treatments.
Dick Artley 3	Don't claim this timber sale is needed to help supply the public's need for wood products. Remove "Utilize	The project does not claim a timber sale is needed to help supply the public's need for wood products. The stated

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

	removed material – timber and smaller trees – to create an economic benefit locally and generate partial funding for the required noncommercial thinning and burning fuel treatments” from the purpose and need.	purpose and need includes <i>“retain industry infrastructure by allowing more wood by-products to be generated from fuels treatments and dead and dying trees, thus providing a wood supply for local manufacturers and sustaining a part of the employment base in rural communities. In some cases, these wood by-products will also help to offset the cost of fuels treatments”</i> (EA, page 5, bullet 3).
Dick Artley 4	The project does not comply with leadership statements regarding best science.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley 5	The recommendations of hundreds of Ph.D. independent scientists with no interest in volume is clearly “best science”.	Refer to comment Dick Artley – A above. The project was developed using management strategies set out in PSW-GTR-220; PSW-GTR-237; RMRS-GTR-292; and RMRS-GTR-178 (EA, page 7, paragraph 1). These technical reports summarize the best available science for managing Sierra Nevada mixed conifer forests. The commenter does not provide science to support reasons for the responsible official to consider.
Dick Artley 6	The EA should reference science used to prepare the 2000 final rule on Forest Service planning.	The commenter doesn’t differentiate between forest planning and project planning. Comments addressing analysis of the 1988 Plumas LRMP and 2004 SNFPA FEIS and ROD are outside of the scope of this project. New and relevant scientific information will be reviewed where it is applicable to project, site-specific analysis.
Dick Artley 7	Scientists quoted in the attachments describe how timber sales will harm and sometimes destroy plants, animals, and their habitats near the sale.	The EA contains analysis of beneficial and adverse effects from project activities completed by various Forest Service resource professionals. Other resource analysis for which no project, site-specific issues were identified are part of the project record. The APA states that agencies are entitled to

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		rely on the view of their own experts”. The courts have reinforced this determination.
Dick Artley 8	The USDA Office of Inspector General concludes that commercial timber sales are not restoration projects.	The project is an integrated vegetation management project that includes commercial and non-commercial thinning, mastication, and prescribed fire. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley 9	Please explain why NOAA should not be trusted.	<p>Refer to comment Dick Artley – A above. In the case of Forest Service prepared documents, it is assumed that the authors used the most recent and applicable literature given that location or their particular project area, the stand types and conditions at the time, and the directions and/or definitions in their Forest Plan(s). As highlighted by some of the excerpts you’ve provided, an abundance of literature and opinion are available on a variety of subjects, each with its own recommendations/findings depending upon the specific site characteristics, research methodology and/or objectives, and/or disturbance event.</p> <p>While general disagreement in the literature exists on many subjects, one common conclusion that can be drawn in almost all cases is that every site and every situation is different. This, in part, is why site-specific analyses are completed. As part of this site-specific analysis the resource experts assigned to the project have the responsibility to determine what the most appropriate scientific literature/information is that reflects the specific project area and situations. The EA completed for this assessment lists cited references where appropriate and provides a list of references.</p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

Dick Artley 10	Clearly, an action that destroys soil, watersheds and biodiversity of native forests is not a restoration project.	Refer to comment Dick Artley 9 above.
Dick Artley 11	An action that damages watersheds, destroy wildlife habitat and imperil plant and animal species is not a restoration project.	Refer to comment Dick Artley 9 above.
Dick Artley 12	Please read what scientists think about your claim that logging restores the forest.	Refer to comment Dick Artley – A above.
Dick Artley – B (issue 2)	Logging road construction causes significant ecological harm. Please analyze an action alternative in detail that does not construct any new roads.	The commenter is concerned about construction of new roads. <i>“The project will not include the establishment of permanent roads. Additionally, temporary roads will be decommissioned no later than three years after the date the project is completed. Necessary maintenance and repair of existing permanent roads would occur. Improvements to permanent roads would include installing critical dips, rolling dips, and work to improve stream crossings”</i> (EA, page 9, paragraph 2). In accordance with the Healthy Forests Restoration Act (HFRA) of 2003 there is no need to evaluate an action alternate that does not construct any new roads (temporary or system) as the commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley 13	Page 6 [of the EA] indicate you plan to construct 1.7 miles of new road as part of the proposed action.	The commenter doesn’t differentiate construction of new National Forest System road and construction and subsequent obliteration of temporary road designed and implemented using BMP. The EA does not analyze for this action as the hydrology report determined that for all project subwatersheds, hydrologic function remains intact, for no action and for all action alternatives. The resource



Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		report is incorporated by reference (EA, page 15, paragraph 1).
Dick Artley 14	Don't exclude a no new road alternative from analysis by claiming the purpose and need will not be met.	We do not. Refer to comments Dick Artley 12 and 13 above.
Dick Artley 15	Without exception, road construction and reconstruction are activities that cause damage to some important natural resources in the forest.	Refer to comment Dick Artley 9, 12 and 13 above.
Dick Artley 16	Since best science and Dr. Dombek agree that there are few more irreparable marks we can leave on the land than to build a road isn't this a valid reason to analyze a no new road alternative in detail?	Refer to comment Dick Artley 9, 12, and 13 above.
Dick Artley 17	Under the arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law standard of the APA you must consider an action alternative with no new road work.	The EA contains analysis of beneficial and adverse effects from project activities completed by various Forest Service resource professionals. Other resource analysis for which no project, site-specific issues were identified are part of the project record. The APA states that agencies are entitled to rely on the view of their own experts". The courts have reinforced this determination. Refer to comments Dick Artley B and 13-16 above.
Dick Artley 18	It is time the USFS stops deceiving the public hoping they will think logging is ecosystem friendly.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 19	You propose to construct new roads in the forest to give you the opportunity to log the forest knowing both activities cause unacceptable natural resource damage.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. Refer to comments B, 9, and 13-16 above.

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

<p>Dick Artley – C (issue 3)</p> <p>John Muir Project 2</p>	<p>Assure DN states herbicides that contain glyphosate will not be applied.</p> <p>We support the removal of invasive plants, but with minimal use of potentially harmful herbicides. We are concerned that the use of mechanical equipment up to the edge of meadows will encourage establishment of invasive plants.</p>	<p>The project does not propose the use of any herbicide application. <i>“Mitigate known and encountered non-native invasive plants throughout the project area by hand pulling and removing or burning”</i> (EA, page 11, bullet 5).</p> <p>Due to the results of survey effort there is a low risk of increased noxious weed invasion. The project specific measures are SOP prevention measures (weed free equipment, avoid driving or parking on occurrences, pile and burn on occurrences) and to hand-treat (pull) any noxious weeds that may be found within the project area (Table A. management requirements, pages 4-5, nonnative invasive plants prevention).</p>
<p>Dick Artley – D (issue 4)</p>	<p>Vigor and increased growth of trees is important only to foresters who manage private industrial tree farms where every tree is destined for the mill.</p>	<p>The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.</p>
<p>Dick Artley 20</p>	<p>Forests with vigorous, fast-growing trees are what foresters managing private industrial tree farms strive to create.</p>	<p>The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.</p>
<p>Dick Artley 21</p>	<p>You present no monitoring data showing there is a shortage of vigorous trees in the sale area.</p>	<p>The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.</p>
<p>Dick Artley – E (issue 8)</p>	<p>The EA fails to describe the effects to air quality, botany, cultural, hydrology, soils, special uses, minerals, recreation &amp; scenery, and roads in Chapter 3.</p>	<p>The commenter doesn’t differentiate EIS and EA. The EA shall provide sufficient evidence and analysis, including the environmental impacts of the proposed action and alternatives(s) to determine whether to prepare either an EIS or a FONSI. [It] may incorporate by reference data, inventories, other information and analyses. <i>“These</i></p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		<i>resources identified no issues for further impact and the resource report is incorporated by reference: Air Quality (USDA Forest Service 2016a), Botany (USDA Forest Service 2016g), Hydrology (USDA Forest Service 2016d), Soils (USDA Forest Service 2016e), Minerals (USDA Forest Service 2016c), Recreation &amp; Scenery (USDA Forest Service 2017a)” (EA, page 15, paragraph 1).</i>
Dick Artley 22	I suggest you contract out future NEPA document preparation until you and your IDT members successfully complete a rigorous course in NEPA.	See comment Dick Artley – E above.
Dick Artley 23	You have chosen to hide this information from the public in order to reduce controversy associated with the proposed action which will increase the chances you will get your precious volume.	See comment Dick Artley – E above. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley – F (issue 9)	The EA does not discuss how the timber sale’s logging and slash/RX burning activities will be mitigated to assure protected bird species individuals and their habitat are not harmed in any way.	There are no Threatened, Endangered, Proposed, or Candidate bird species within the project area. On September 18, 2015, the USFWS issued a positive 90-day finding on a petition to list the California spotted owl. A positive 90-day finding indicates that the USFWS believes that substantial scientific or commercial information was provided by the petitioner and that the petitioned action may be warranted. An action alternative was developed and analyzed following the interim recommendations for the management of California spotted owl habitat on National Forest System lands.
Dick Artley 24	Your references section does not contain the following important literature or comparable literature, therefore your migratory bird discussions	Current management direction relevant to the proposed action as it affects migratory birds can be found in: Forest Service Manual and Handbooks (FSM/H 2670), Plumas

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

	are based on unsubstantiated speculation.	National Forest Land and Resource Plan (LRMP 1988), and the Sierra Nevada Forest Plan Amendment (SNFPA 2004). Each of these planning efforts have addressed and considered opportunities to promote the conservation of migratory birds and their habitats at the project level through the adherence of Forest Plan Standards & Guidelines.
Dick Artley – G (issue 13)	Increases in national forest logging do not stabilize or enhance the economy of small communities located near the forest.	The project does not include this statement in the purpose and need. Please refer to Dick Artley 3. The purpose and need from the EA which is later quoted is not the same. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley 25	The EA must describe why a June 2000 study from Washington State does not apply to this project.	See Dick Artley 3 and Dick Artley – G above.
Dick Artley 26	Why do you reject the findings and conclusions of Undersecretary of Agriculture Jim Lyons?	See Dick Artley – G above.
Dick Artley 27	You reject the research conclusions of 241 Ph.D. scientists quoted in Opposing Views Attachment #1.	See Dick Artley – A, Dick Artley – G, and Dick Artley 5 above.
Dick Artley 28	If you were really concerned about local community stability and local job creation you would offer this sale as an SBA sale.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley – H (issue 16)	Noise and dust caused by timber harvest adversely affects recreation and wildlife, thus these adverse social and environmental impacts must be disclosed.	Please refer to Dick Artley – E above.
Dick Artley 29	Under NEPA required to disclose and analyze all effects positive and negative.	Please refer to Dick Artley – E above.

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

Dick Artley – I (issue 17)	You do not disclose how implementing the Gibsonville timber sale will affect climate change.	Please refer to Dick Artley – E above. Refer to page 39 of Silviculture report and to ‘A summary of current trends and probable future trends in climate and climate-driven processes in the Sierra Cascade Province, including the Lassen, Modoc, and Plumas National Forests’. The commenter does not provide a direct relationship to the proposed action or supporting reason for the responsible official to consider.
Dick Artley – J (issue 18)	If you care about maintaining aquatic species health you would indicate that all newly constructed temporary roads will be obliterated after use.	Please read EA, page 9, paragraph 2.
Dick Artley 30	If you do not indicate that your proposed temporary roads will be obliterated it will show you plan to allow these temporary roads to pump sediment for decades.	Please refer to Dick Artley – J above.
Dick Artley 31	Refers a quote from J.E. Moll, 1996 regarding obliterating temporary roads.	Please refer to Dick Artley – J above.
Dick Artley 32	Refers to a quote from the EPA regarding obliterating temporary roads.	Please refer to Dick Artley – J above.
Dick Artley 33	You ignore agency best management practices.	Please read Table A., Management requirements to reduce or prevent adverse effects by Gibsonville Project.
Dick Artley – K (issue 20)	The proposed action will clearly cause the resource degradation and destruction described in the attachments.	Refer to comment Dick Artley – A and Dick Artley 9 above.
Dick Artley 34	The Gibsonville timber sale will cause major damage to non-vegetative natural resources described by hundreds of Ph.D. experts.	Refer to comment Dick Artley – A and Dick Artley 9 above.

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

Dick Artley 35	The Gibsonville sale will take away more undeveloped national forest acres from the legacy the unborn kids of the future.	The Gibsonville project area is young growth forest within highly disturbed hydraulic mining lands. The EA clearly sets out the unnatural conditions on the ground. The commenter does not provide a direct relationship to the proposed action, local environment, or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
American Forest Resource Council 1	The project's thinning should be designed to ensure that stocking density does not exceed an upper limit of 60% of maximum SDI for at least the next 20 years.	The issue is already decided by higher level decision: The Forest Plan as revised sets standards and guidelines that include minimum retained basal area and canopy cover.
American Forest Resource Council 2	If the biomass planned for removal is not in an HHZ, and therefore unlikely to be purchased, the removal of the biomass should not be required under timber sale contracts; it should be subject to agreement.	The entire project area is within Tier 1 and 2, HHZ. The contract requirements will be to remove biomass to the landings. Removal from the project area would be subject to agreement if a purchaser is likely.
American Forest Resource Council 3	The Forest needs to consider using regular wildlife (California spotted owl) surveys over large areas to possibly clear individual projects from needing to apply LOPs.	Spotted owl surveys in the Gibsonville area occurred in 2011, 2012, 2013, and 2016. Prior to implementing activities within or adjacent to a PAC, we will conduct surveys to establish or confirm the location of the nest or activity centers for the LOP.
American Forest Resource Council 4	We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results.	Contract provisions are in place to provide resource protection and adherence to BMP. Most are standard in Forest Service contracts and will not be changed. As long as requirements for resource protection are met, no restrictions are made on type of equipment used to get the work done (EA, page 16, paragraph 1).
American Forest Resource Council 5	Please see the attached document titled 'NSO Canopy Condition' as an addendum to these comments for consideration in how the treatments on this project are designed and how this design	The attached document contains a review with numerous excerpts from a variety of different authors in different locations and with different objectives. While we do not necessarily dispute disclosures in the cited documents,

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

	affects the spotted owl. Based on this extensive literature review, AFRC has concluded that canopy condition related to the effects on spotted owls should be measured using canopy closure rather than canopy cover.	<p>neither do we categorically agree with the findings or recommendations in the literature referenced.</p> <p>The issue is already decided by higher level decision: both the forest plan as amended and the IR set standards and guidelines for maintaining spotted owl habitat measured using canopy cover. Forest Plan revision and a new CSO Conservation Strategy are the appropriate scope for the issue.</p>
American Forest Resource Council 7	There is a need to develop water sources on the sale area for general road dust abatement as well as for fire suppression, under-burning, and wildlife needs.	There are water sources existing along the LaPorte Quincy Road. Water source development is beyond the scope of this project as no issues relating to water sources were identified during project development and/or scoping. We can look into the need to develop additional water sources during future projects.
Plumas Forest Project 1	I believe the most prudent and effective course of action would be to analyze and implement a handthin/underburn and underburn only alternative.	<p>Section 104, Environmental Analysis, of the Healthy Forests Restoration Act (HFRA) of 2003 provides in (c), consideration of an additional action alternative, if the additional alternative is proposed during scoping or the collaborative process. It further sets forth that if more than one additional alternative is proposed, the agency shall select which additional alternative to consider, at the sole discretion of the agency. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. Under HFRA the agency was under no obligation to evaluate an additional action alternative after having gone through the scoping and collaboration processes.</p> <p>In the case of a handthin/underburn and underburn only alternative the commenter states that they offered scientific</p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		<p>evidence to support their comment. In fact, the only evidence offered were references to crown fire as regards fuels reduction only. The Gibsonville project is an integrated vegetation management project that includes commercial and non-commercial thinning, mastication, and prescribed fire.</p> <p>The project was designed under the authorities, purposes, and needs of the HFRA of 2003 as amended. As part of this site-specific restoration project the resource experts assigned have the responsibility to determine what the most appropriate scientific literature/information is that reflects the specific project area and situations. The project record lists cited reference where appropriate and provides a list of references. The APA states that agencies are entitled to rely on the view of their own experts. The courts have reinforced this determination.</p>
Plumas Forest Project 2	The EA should also analyze a 2001 Framework alternative because of the USFWS's current 90-day finding on a petition to list the California spotted owl.	<p>In late 2014, the Forest Service commissioned a group of prominent spotted owl scientists and forest ecologists from within and outside of the Forest Service to recommend changes to current management direction needed to provide for the conservation of the species. The culmination of this effort was the May 2015 interim recommendations. The IR represent the best available science on California spotted owl management in the Sierra Nevada. As such, an alternative consistent with the IR was developed for the project as analyzed in the EA. Please refer to PFP 1 above.</p>
Plumas Forest Project Objection Issue 1, April 17, 2017.	Issue 1: I object to the Forest's negative response to my request for handthin and underburn alternative and a 2001 Framework alternative. In responses to previously submitted, project specific comments, the	Refer to the Issue Exhaustion, Record Citation and Analysis Worksheet, Objection #17-05-11-0003-O218-HFRA, Gibsonville Healthy Forest Restoration Project (PALS #47960) located at:



Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

	Forest Service indicate they are not analyzing other alternatives because of the 2015 California Spotted Owl Interim Guidelines and that they represent the best available science. (Objection, page 1).	<a href="https://usfs.app.box.com/file/253480414152">https://usfs.app.box.com/file/253480414152</a>
Plumas Forest Project 3	I don't believe in aspen restoration through mechanical means.	<p>The aspen restoration treatments were developed using management strategies set out in RMRS-GTR-178 <i>Ecology, Biodiversity, Management, and Restoration of Aspen in the Sierra Nevada</i>. This technical report summarizes the best available science regarding aspen in the Sierra Nevada.</p> <p>Refer to the revised EA (page 3, paragraphs 4, 5, need for aspen restoration; page 5, first bullet, specific purpose and authorization for releasing aspen; page 7, paragraph 7, proposed treatment prescriptions for aspen release; page 29 paragraphs 2-5, effects analysis of aspen treatments on stand structure in regard to fire resistant and resilient structure; and page 32 paragraphs 5, 6 effects analysis of aspen treatments on wildlife.</p> <p>As part of this site-specific restoration project the resource experts assigned have the responsibility to determine what the most appropriate scientific literature/information is that reflects the specific project area and situations. The project record lists cited references where appropriate and provides a list of references.</p> <p>The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.</p>
Plumas Forest Project 4	The commenter provides anecdotal references to variable density thinning (VDT) and photographs of	The proposed action (Alternative B) and action alternative (Alternative C) were developed using management

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

	stands on other districts that don't reflect " <i>a true application of variable-density thinning prescription</i> ".	<p>strategies set out in PSW-GTR-220 <i>An Ecosystem Management Strategy for Sierran Mixed-Conifer Forests</i>; PSW-GTR-237 <i>Managing Sierra Nevada Forests</i>; and RMRS-GTR-292 <i>A Comprehensive Guide to Fuel Management Practices for Dry Mixed Conifer Forests in the Northwestern United States</i>. These technical reports summarize the best available science for managing Sierra Nevada mixed conifer forests (EA, page 7, paragraph 1).</p> <p>The revised EA (page 7, paragraphs 3, 4) describe VDT prescriptions. The <i>Gibsonville Healthy Forest Restoration Project Silvicultural Prescriptions and Marking Guidelines</i>, (pages 12-15) establish the prescription for VDT and biomass removal, including objectives and desired conditions, area of treatment within units, constraints, and additional treatments.</p> <p>The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.</p>
Plumas Forest Project 5	<p>There is a lot of top-notch science out there regarding severe bark beetle infestations and whether or not logging is an appropriate response. I'm in favor of the science that says it's not. I'm a firm believer that the forest can largely manage its own affairs far better than we can.</p>	<p>Refer to the revised EA (page 1, paragraphs 5-7 and page 2, paragraph 1, need for forest health treatments to address insect or disease infestation; page 4, specific purpose and authorization for treatments to reduce the risk or extent of, or increase the resilience to, insect or disease infestation in the area; pages 7-9, proposed prescriptions for forest health treatments; and pages 20-26, effects analysis of proposed treatments on forest health.</p> <p>As part of this site-specific restoration project the resource experts assigned have the responsibility to determine what the most appropriate scientific literature/information is that</p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		<p>reflects the specific project area and situations. The project record lists cited references where appropriate and provides a list of references.</p> <p>The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.</p>
<p>Plumas Forest Project Objection Issue 2, April 17, 2017.</p>	<p>Issue 2: In the case of the Gibsonville Project, 116 acres are subject to the Interim Recommendations while about 1,000 acres seemed to be managed according to the 2004 Framework. This includes significant fuel reduction areas subject to canopy closure reduction to 40% and other areas of virtual clearcutting in the names of aspen release, meadow restoration, and riparian restoration. The Forest Service is not following the Interim Recommendations (Objection, page 1).</p>	<p>Refer to the Issue Exhaustion, Record Citation and Analysis Worksheet, Objection #17-05-11-0003-O218-HFRA, Gibsonville Healthy Forest Restoration Project (PALS #47960) located at: <a href="https://usfs.app.box.com/file/253480414152">https://usfs.app.box.com/file/253480414152</a></p>
<p>John Muir Project 1</p>	<p>We support the protection and enhancement of cultural features within historic Gibsonville. The 2004 Framework assumed that structure protection is best accomplished by a ¼-mile wide Defense Zone surrounding towns, and groups of cabins, as well as an additional 1.5-mile wide Threat Zone surrounding the Defense Zone. This is refuted by newer and more robust scientific information.</p>	<p>The issue is irrelevant to the decision to be made. The historic Gibsonville townsite restoration is not WUI defense. This part of the project was proposed and developed by the district Archeologist to address issues of looting, to help protect the site, and help with the Forest's long term management of the site.</p> <p>Refer to the revised EA (page 3, paragraph 3, need for protection of the historic townsite; page 4, paragraph 3, bullet 3, specific purpose and authorization for treatments to protect historic townsite; pages 7, paragraph 6, proposed treatment prescriptions; and page 19, paragraphs 1-5 effects analysis of proposed treatments on heritage</p>

Response to Comments on Gibsonville Healthy Forest Restoration Environmental Assessment – January 3, 2018

		resources.
John Muir Project 3	Using what are essentially 30 acre clear cuts around the perimeter of each aspen grove is not supported by the best science. A more scientifically-supported, fiscally efficient and ecologically-sound management approach would be the use of managed mixed-intensity fire, and post-treatment fencing to exclude domestic livestock.	<p>The issue is irrelevant to the decision to be made. The combined acreage for all aspen restoration within the project area is 22.8 acres. There are no active range allotments within the five subwatersheds (5,330 acres) the Gibsonville project falls within.</p> <p>Refer to PFP 3.</p>